

EXHIBIT B



"Esserman"
<esserman@sbep-law.com>

09/18/2005 09:58 PM

Please respond to
esserman@sbep-law.com

To "Barbara Harding" <bharding@kirkland.com>, "Sander
Esserman" <esserman@sbep-law.com>

cc "Janet Baer" <jbaer@kirkland.com>, "Salvatore Bianca"
<sbianca@kirkland.com>, "David Mendelson"
<dmendelson@kirkland.com>

bcc

Subject Re: Grace---questionnaire on estimation of personal injury
liabilities

Ok--Just let me know what time so I will be available.

-----Original Message-----

From: Barbara Harding <bharding@kirkland.com>

Date: Sun, 18 Sep 2005 22:55:51

To:"Sander L. Esserman" <Esserman@sbep-law.com>

Cc:"Janet Baer" <jbaer@kirkland.com>, "Salvatore Bianca"

<sbianca@kirkland.com>, David Mendelson <dmendelson@kirkland.com>

Subject: RE: Grace---questionnaire on estimation of personal injury
liabilities

Sandy, I will call you tomorrow. Barbara

Barbara Harding | Partner | KIRKLAND & ELLIS LLP |
655 Fifteenth Street, NW, Suite 1200 | Washington DC 20005-5793
(202) 879-5081 DIRECT | (202) 879-5200 FAX | (301) 785-8369 CELL |
bharding@kirkland.com

Sander L. Esserman <Esserman@sbep-law.com>

09/16/2005 07:59 PM

To Janet Baer <jbaer@kirkland.com>, Barbara Harding <bharding@kirkland.com>

cc Salvatore Bianca <sbianca@kirkland.com>

Subject RE: Grace---questionnaire on estimation of personal injury liabilities

Jan and Barbara--I have not heard your response to the email below.

I have also not heard from you regarding the request of Reaud, Morgan & Quinn (RMQ) to be dropped from the other Motion you filed on discovery and questionnaires to attorneys currently set for status conference on Sept. 26th. As I explained in previous email RMQ does not file silica claims, does not file retread cases, was not critisi by Judge Jacks in any respect and had clients listed in your Motion that were covered by previous written settlement agreements with WR Grace that had their files reviewed and approved by WR Grace. RMQ believes it has been improperly named in your pleading. By previous email I had requested to contacted by last Wednesday, September 14, 2005, I have not had a response by either email or telephone call from anyone at your firm on this request.

Sandy

Sander L. Esserman
Stutzman, Bromberg, Esserman & Plifka
2323 Bryan Street, Suite 2200
Dallas, Texas 75201-2689
(214) 969-4910
(214) 969-4999
Email: esserman@sbep-law.com

-----Original Message-----

From: Janet Baer [mailto:jbaer@kirkland.com]
Sent: Tuesday, September 13, 2005 2:07 PM
To: Sander L. Esserman
Cc: Barbara Harding; Salvatore Bianca; jay.hughes@grace.com
Subject: RE: Grace---questionnaire on estimation of personal injury
liabilities

Sandy: I have your e-mail message as well as the previous one and your voice mail message. Sorry, I was out of town so am just getting the messages reviewed. While I have a working knowledge of what is going on, I am not the one in charge of this process. That is my partner Barb Harding in Washington DC. I have already forwarded on to her your voice mail message and I will also forward to her you two e-mail messages. I will also talk with Barb about your claims as I, do indeed, have background here that she does not have. Either I or Barb will get back to you after we have had a chance to review you inquiry and discuss the matter. Jan

Janet S. Baer
Kirkland & Ellis LLP
312-861-2162
312-660-0362 (fax)
200 E. Randolph
Chicago, IL 60601

Sander
L.
Esserman
<Esserman
@sbep-law
.com>
09/13/2005
5 12:20
PM
To
<jbaer@kirkland.com>
cc
Subject
RE:
Grace---questionnaire
on estimation of
personal injury
liabilities

Jan--Reaud, Morgan & Quinn (the Firm) received around 26 boxes full of questionnaires evidently sent pursuant to your discovery on asbestos matters and estimation. It is our view that the questionnaires need not be answered by the Firm for several reasons:

1. The questionnaire just applies to claims in litigation in the tort system--the claims of the Firm's clients were settled prepetition with a written settlement agreement and many of not most of the claims have been dismissed. The Firm's clients do not fit within the scope of the discovery for the prepetition litigation claims and are not covered therein.
2. The procedures and questionnaire are for estimation discovery--the Firm's clients have settled their claims pursuant to the written settlement agreement with the values set forth--therefore to the extent you need numbers for estimation purposes the settlement agreement provides the guide for the amounts. Even if the questionnaire is applicable to the Firm's clients, which we think it is not, then you have the information from the agreement and the back-up data all of which was called for in the settlement agreement.
3. WR Grace has all of the claims data and submissions of the Firm's clients at its facilities. Jay Hughes is familiar with these submissions and the location of the files.

Please promptly let me know if you agree with the Firm's clients are not covered by the estimation questionnaire. I would like to know your response to this by tomorrow at noon. I look forward to hearing from you on this.

Sandy

PS--if you are not the person that can make this decision for WR Grace--please forward this email to those persons involved. I will also be available to discuss this matter with you or the applicable person.

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